REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Claims 15-16 and 18-30 are pending, Claim 17 having previously been canceled and Claims 1-14 previously having been withdrawn from consideration.

In the outstanding Office Action Claims 15-16 and 18-30 were rejected under 35 U.S.C. § 103 as being obvious over Jaunich (U.S. Patent 6,605,880) in view of Tsui (U.S. Patent Publication 2003/0040847, hereinafter Tsui); Claims 25-26 were rejected as being unpatentable over Jaunich, Tsui and in further view of the article "Short-Term Wind Forecasting"; Claims 15-16, 18-30 were rejected as being obvious over Jaunich in view Tsui and in further view of Hasegawa et al. (hereinafter "Hasegawa").

Applicants incorporate by reference the subject matter of the Request for Reconsideration of August 15, 2010.

In this earlier filed Request for Reconsideration Applicants noted that the present application is a continuation-in-part (CIP) of U.S. Serial No. 09/749,999, filed December 29, 2000. December 29, 2000 is before the effective date of Tsui and so Tsui is not prior art with respect to the presently pending claims.

However, in the outstanding Office Action, the Office explained it could not find adequate support for Claim 15 in originally filed Claim 116 (i.e., Claim 116 from 09/749,999). Therefore in paragraph 10 of the outstanding Office Action, the Office requested that Applicants identify where there is support for amended Claim 15 in application 09/749,999 so the proper time frame can be given.

In reply, a more detailed description is now given regarding where Claim 15 finds support in parent patent application 09/749,999.

As a preliminary matter it should be noted that the present patent application (CIP) added new Figures 37-39, while keeping common Figures 1-36 and associated written

disclosure. As will be discussed below, the figures and original text in parent application 09/749,999 provided adequate support for Claim 15 as will now be described in more detail. For the Examiner's convenience, Claim 15 is reproduced below with annotations. The detailed remarks for the annotations are listed after Claim 15.

Claim 15 (Previously Amended): A method for coordinating power output from a renewable power production facility with another power production facility so as to implement a virtual energy storage mechanism **[A]** for the renewable power production facility, comprising steps of:

[B] producing and applying to transmission lines a predetermined amount of electric power collectively provided by from the renewable power production facility and from said another power production facility **[C]**, said renewable power production facility applying a variable amount of electric power **[D]**, and said another power production facility applying a controllable amount of electric power;

[E] determining with a hardware processor that a produced amount of power produced by the renewable power production facility deviates from a threshold by a predetermined quantity;

[F] informing via digital communications said another power production facility of said predetermined quantity;

[G] adjusting and applying to the transmission lines **[H]** a power output of said another power production facility by an amount that corresponds with said predetermined quantity and compensating for any deviation from the threshold by the renewable power production facility and have a resultant total power produced by or on behalf of the renewable power production facility to be approximately at said threshold; **[I]** and

[J] keeping an account balance in a computer storage memory of an amount of energy, and subsequently fulfilling a production obligation of said renewable power

production facility and producing said amount of energy by the another power production facility on behalf of the renewable power production facility **[K]**, wherein said another power production facility serves as the virtual energy storage mechanism by releasing stored resources to and processing power that covers a production shortfall by said renewable power production facility **[L]**, and by increasing potential energy capturing and storing resources at the another power production facility that offsets a production surplus by the renewable power **[M]** production facility.

LIST OF ANNOTATIONS

[A] Preamble of Claim 116. Abstract – "This substitution of one power production facility for another is referred to herein as a virtual energy storage mechanism.

[B] See, e.g., original Claim 116 that describes producing a predetermined amount of electric power from the renewable power production facility. Also see Figure 11, element 357 as well as Figure 5 and "grid", in which the electric power is provided to the "grid", which are transmission lines [0109].

[C] See Figure 9, and the corresponding description at [0085] explaining that "the wind turbine facility has a coupling relationship with a virtual energy storage facility such as a hydroelectric plant, such that the premier power is able to be handled just as conventional hydroelectric power...

[D] See Figure 9, showing varying amount of power for the renewable power production facility, as well as Figure 24, step S2415 explaining that an amount of energy produced to a "alternative energy production facility" (S2409) is to offset a shortfall/surplus from the wind turbine energy production facility.

[E] See the "determining" step from Claim 116. Also see paragraph [0127], explaining the use of the processor that may be a microprocessor, as well as Figure 5, element 500 and Figure 11, element 305, for example.

[F] See the "informing" step of Claim 116 and also the data structures shown in Figures 15-18 for example.

[G] See the "adjusting" step of Claim 116.

[H] See the "grid" in Figures 5, 11 and the interrelationship between the controllable hydroelectric power and premiere wind power provided in Figure 9 showing that the power output of the another power production facility (hydroelectric power) is applied by an amount that corresponds with the predetermined quantity so that the combination of the power produced from the hydroelectric power and wind power, combines to be a fixed amount that can then be offered for sale as conventional "units" in a market setting [0085].

[I] See Step 2415 and the corresponding description at [0163], that explains that an amount of energy production is adjusted so as to offset the shortfall/surplus from the wind turbine energy production facility.

[J] This incorporates the features of original Claim 118 from parent application 09/749,999, with respect to keeping an account balance held by the virtual energy storage mechanism in behalf of the renewable power production facility.

[K] See Abstract "when the wind turbine power production facility experiences a shortfall in its power production output it may make a request to the other source of electric power and request that an increase in its power output on behalf of the wind turbine facility" (Abstract). Also see [0085] which explains "coupling relationship" with a virtual energy storage facility and a hydroelectric power plant such that the premiere power is able to be handled just as conventional hydroelectric power. Also, see Figure 24 step 2415 as discussed above with regard to producing the amount of energy by the another power production facility on behalf of the renewable power production facility.

[L] See Abstract as discussed above and [0028], explaining that "wind power may be reliably supplemented with energy either stored or released from a virtual energy storage facility". See also [0080], [0082], [0156], for example.

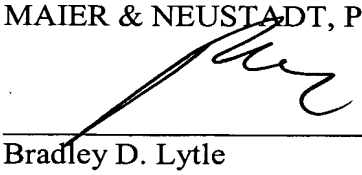
[M] See, e.g., [0075] explaining that "other operators may purchase from a wind farm operator a surplus of potential energy saved in the wind farm operator's virtual storage energy account. The potential energy assets will tend to accumulate in the wind farm operator's account if the wind turbine experience a greater than predicted amount of wind".

In view of the above, it is respectfully submitted that Applicants have complied with the Examiner's request to explain where there is support for amended Claim 15 in parent application 09/749,999. It is believed that the above cited examples are merely exemplary citations in the originally filed patent specification of Serial No. 09/749,999. Numerous other examples exist and if there is any doubt with regard to support for any of the elements, the Examiner is invited to telephone the undersigned so additional examples may be cited and a speedy resolution to this prosecution may be concluded.

Consequently, since all of the prior art rejections are based on Tsui and Tsui is not prior art with regard to the present patent application it is respectfully submitted the present application is in condition for formal allowance. A Notice of Allowance is earnestly solicited.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



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